

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

APR 10 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Administration of the North American)	CC Docket No. 92-237
Numbering Plan)	
)	
Carrier Identification Codes (CICs))	

COMMENTS

Sprint Corporation hereby respectfully submits its comments in the above-captioned proceeding in response to the Public Notice released March 26, 1998 (DA 98-591). The Commission has sought comment on *ex parte* letters submitted by MCI and VarTec Telecom regarding the intercept message and Special Information Tones (SITs) to be used by the LECs to inform callers that a dialing pattern change has occurred as a result of the expansion from three to four-digit CICs. MCI has requested that the Commission order the removal of the "extraneous and unnecessary" first sentence of the intercept message adopted by the Network Interconnection Interoperability Forum (NIIF), and that SITs not be used. VarTec also objects to use of SITs, and in addition requests that the Commission take action to ensure that all LECs use the standard intercept message developed by the NIIF.¹ As discussed briefly below, Sprint believes that all

¹ VarTec also stated that certain LECs, including Sprint, refused to accept the message it wished to include on the VarTec portion of the LEC invoice (March 23 *ex parte* letter, p. 6). Although the instant Public Notice requests comment only on issues relating to the standard intercept message, Sprint would note that the Sprint LECs have already reached an agreement with VarTec to include VarTec's message on its portion of the Sprint local telephone invoice. As Sprint had previously explained to VarTec, the initial message proposed by VarTec was marketing ("...the Dime Line number 10811 you have been using to save on all long distance calls will now have a '10' preceding it so that it will become 1010-811 (easily remembered as

Footnote continued on next page

No. of Copies rec'd 024
List A B C D E

LECs should use the intercept message adopted by the industry under the auspices of the NIIF, without use of SITs.

Sprint believes that customer confusion will be minimized, and customer education efforts will be reinforced, if a single, standard intercept message is implemented by all LECs to inform customers of the need to use a 4-digit rather than a 3-digit CIC at the end of the permissive dialing period. Such a message has been discussed, developed, and adopted by the industry under the auspices of the NIIF,² and Sprint agrees with VarTec's assertion that the Commission's mandate that "LECs must offer a standard intercept message" developed in consultation with and with the agreement of IXCs,³ requires that all LECs implement the NIIF-developed intercept message. However, any problem with LECs' refusal to implement the NIIF-developed intercept message appears to have been largely resolved. VarTec identified three LECs (Sprint, GTE and SNET) which initially declined to implement this message. In mid-March 1998, Sprint's local telephone division decided to use the message adopted by the industry through the NIIF, and so informed its carrier customers, including VarTec. It is Sprint's understanding that GTE also has

'Dime-Dime-811')") rather than informational in nature. Sprint's billing and collection agreement with VarTec was for casual traffic only and did not allow for marketing messages. However, Sprint did outline for VarTec how the message might be re-written in order to provide customers notice of the CIC change, offered to amend the billing and collection agreement to provide for the inclusion of a message from VarTec, and offered to work with VarTec to expedite review of a revised message so that it would appear on the May and June 1998 billing statements. The day after VarTec filed its *ex parte* letter, it notified Sprint that it would accept Sprint's offer and provided Sprint with a revised message acceptable to both parties.

² The intercept message agreed to by the industry is:

Your call cannot be completed as dialed. If you dialed a 5-digit code, it has changed. Please redial adding a one and a zero before the 5-digit code, or for assistance, contact the carrier you are trying to use.

³ See *Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking* released October 22, 1997 (FCC 97-386) in this docket, para. 26.

decided to use the NIIF-developed intercept message, and that SNET is working with its switch vendors to implement the NIIF-developed message in all of its switches.

Thus far, it appears that only MCI has any objection to the wording of the standard intercept message. However, the Commission should reject MCI's proposed deletion of the first sentence of the NIIF intercept message.⁴ MCI states that this sentence ("Your call cannot be completed as dialed") is "superfluous" because it "state[s] the obvious" (March 17, 1998 *ex parte* letter, p. 4), and that upon hearing this sentence, some callers will hang up rather than wait to hear the new dialing instructions (MCI NIIF contribution dated January 20, 1998). Sprint disagrees. MCI has presented no evidence to suggest that callers will hang up immediately upon hearing that their call "cannot be completed as dialed," particularly if the remainder of the intercept message – which MCI supports – flows smoothly and without unnatural hesitation after the initial sentence of the intercept message. Indeed, in order to ensure that the length of the intercept message is within the time limitations on existing equipment, there is an incentive to record the whole announcement concisely. (The Sprint LECs, for example, are taking steps to digitally compress the NIIF-developed intercept message to last under 10 seconds.) Sprint is concerned that if MCI's proposed deletion is implemented, rather than hanging up immediately, some callers attempting to use a 5-digit access code after the end of the permissive dialing period may stay on the line at the conclusion of the intercept message, wondering why the call is not going through.

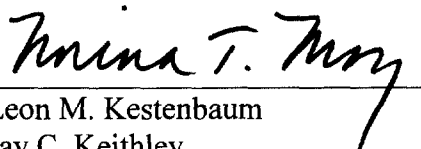
⁴ It is MCI's prerogative to bring before the Commission its objection regarding the intercept message agreed to by the rest of the industry. However, Sprint would note that MCI's objections were duly noted and discussed at the NIIF prior to the vote on the intercept message that was ultimately adopted by the rest of the industry.

MCI and VarTec also state that because "a high number of callers typically hang up immediately upon hearing a SIT" (MCI March 17 *ex parte* letter, p. 4; *see also*, VarTec March 23 *ex parte* letter, p. 5), the Commission should direct LECs not to use SITs prior to the standard intercept message. Because there is no engineering need to include a SIT prior to the standard intercept message (indeed, SITs take up memory space in the switch), Sprint agrees that LECs should not use a SIT.⁵

For the reasons set forth above, all LECs should use the standard intercept message developed by the NIIF, without a SIT. There is no reason why such message cannot be implemented by June 30, 1998, and no reason why the permissive dialing period should be extended beyond that date.

Respectfully submitted,

SPRINT CORPORATION


Leon M. Kestenbaum
Jay C. Keithley
Norina T. Moy
1850 M St., N.W., Suite 1110
Washington, D.C. 20036
(202) 857-1030

April 10, 1998

⁵ The Sprint LECs do not plan to use a SIT prior to the intercept message.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **COMMENTS OF SPRINT CORPORATION** was Hand Delivered or sent by United States first-class mail, postage prepaid, on this the 10th day of April, 1998 to the below-listed parties:

Richard Metzger
Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

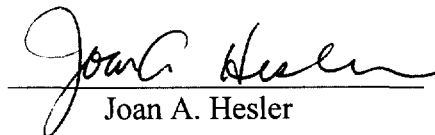
Geraldine Matisse
Chief
Network Services Bureau
Federal Communications Commission
2000 M Street, N.W., Room 235
Washington, D.C. 20554

Kris Monteith
Network Services Division
Federal Communications Commission
2000 M Street, N.W., Room 235
Washington, D.C. 20554

International Transcription Service
1919 M Street, N.W.
Washington, D.C. 20554

James Troup
Robert Jackson
Arter & Hadden
1801 K Street, N.W.
Washington, D.C. 20006
Counsel for Vartec

Jonathan Sallet
MCI
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006


Joan A. Hesler